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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE IN
SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am an attorney at Bathaee Dunne LLP, Interim
4 Co-Lead Counsel for the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge
5 of the facts set forth herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Administrative Motion to
7 Consider Whether Another Party's Material Should Be Sealed, filed in connection with the concurrently
8 filed discovery dispute letter ("Letter").

9 3. Certain documents and information referenced in the Letter have been designated by
10 Defendant Meta Platforms, Inc., as "Confidential" or "Highly Confidential" under the Stipulated
11 Protective Order (Dkt. No. 111).

12 4. Portions of the Letter referencing or reflecting the contents of the documents and
13 information designated by Meta Platforms as "Confidential" or "Highly Confidential" have been
14 redacted from the publicly filed version of the Letter. *See* Civil L.R. 79-5(e)(1).

15 5. An unredacted version of the Letter with these references highlighted is filed herewith.
16 *See* Civil L.R. 79-5(e)(2), (f)(1).

17 6. Advertiser Plaintiffs' request is limited to documents and information produced by Meta
18 Platforms marked Confidential or Highly Confidential, or information directly reflecting documents
19 and information produced by Meta Platforms marked Confidential or Highly Confidential. This request
20 is thus narrowly tailored to seek sealing only of potentially sealable material.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on April 21, 2022, in Pasadena, California.

23 s/ Brian J. Dunne
24 Brian J. Dunne

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